



EnSafe / Allen & Hoshall

a joint venture for professional services

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Subject: CTO-094; NSA Memphis RCRA Facility Investigation, Millington, Tennessee

Document Transmittal — Revision 2 errata pages for Assembly B RFI Report, NSA Memphis

Reference: Contract N62467-89-D-0318 (CLEAN II)

Dear Sir:

Please find enclosed one copy of the errata pages to the NSA Memphis *Assembly B RFI Report, Revision 2*. As requested, copies have been distributed to the BRAC Cleanup Team and others as shown on the attached NSA Memphis RFI Distribution List.

Please replace the pages in Revision 1 with the enclosed Revision 2 versions. Also included are green "final" cover and spine inserts, as well as a written Response to Comments. The green covers should replace the white "draft" covers and spines of Revision 1.

If you have any questions or comments of a technical nature, please contact Tim Moore or Lawson Anderson at 901/372-7962. Comments or questions of a contractual nature should be directed to Debra Blagg at 901/386-9344.

Sincerely,

EnSafe/Allen & Hoshall

By: Tim R. Moore
Environmental Scientist

Enclosures: As Stated

cc: Contracts File: CTO-94 (w/out enclosure)
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Assembly B RFI Report — NSA Memphis
Revision 2
Response to Region IV EPA Comments

Only report sections regarding SWMUs 4, 6, 10, 31, and 38 were changed. No comments applied to the sections regarding SWMU 40.

- (1) **Comment:** Change the document appropriately to reflect the most recent residential and industrial soil RBCs for Aroclor 1260 that are printed in the USEPA Region III January to June, 1996 RBC table.

Response: *Updated tables and text that contained the old RBCs. The following sections were affected:*

Page 6-27, Table 6-5: updated the residential and industrial Aroclor 1260 soil RBCs and removed the "bold" attribute from the Aroclor 1260 result for sample 004-M-0002-02, as it no longer exceeds an RBC. (The residential soil RBC increased from 140 µg/kg to 320 µg/kg and the industrial soil RBC increased from 1,300 µg/kg to 2,850 µg/kg.)

Page 6-30, Table 6-5 footnotes: updated the RBC footnote reference. The USEPA Region III January to June 1996 RBC table is now cited instead of the 1995 version.

Page 6-31, paragraph 2: changed the text to indicate no soil RBC exceedances.

Page 6-33, Figure 6-6: changed the color attribute of the sediment sample from location 4-2 from blue to green, indicating no soil RBC exceedances at this sample location.

- (2) **Comment:** Although no comment applies to this entry, internal review prompted the following changes to the following sections of the document for clarification purposes.

Response: *Page 6-37, Figure 6-8: the Revision 1 version of this figure inadvertently indicated several metals as exceeding RCs and RBCs. The errors have been corrected in the Revision 2 version and the number of exceedances has decreased.*

Page 6-42, Table 6-7: the beryllium concentration (0.6 mg/kg) detected in sample 004-M-0002-02 was re-entered with a "bold" attribute as its detected concentration exceeded the residential soil RBC of 0.15 mg/kg.

Page 6-43, Table 6-7: removed the sample data for reference samples 006-M-0006-01 and 006-N-0006-01. The data from these samples were used to create the reference concentrations (RCs) that were compared to actual site concentrations and are not considered representative site data. Also, the sample data for sample 038-M-0004-02 that was located on page 6-44 in Revision 1 was moved to page 6-43 so it would be contained in the table with the appropriate RCs for comparison.

Page 6-44, Table 6-7: removed the sample data for reference samples 038-M-0007-01 and 038-M-0007-02. The data from these samples were used to create the reference concentrations (RCs) that were compared to actual site concentrations and are not considered representative site data.

Page 6-50, paragraph one: changed the number of SSV exceedances for sample location 31-1 from "six" to "seven".

Page 6-50, paragraph three: changed the concentration of cadmium detected in the 18-24" interval at sample 38-4 from 16.2 mg/kg to 1.1 mg/kg.

Page 6-50, paragraph four: changed the number of RC exceedances for samples in the North Fork Creek Area from "ten" to "eleven".

Page 6-51, paragraph two: changed the first sentence in the paragraph to indicate that the cadmium concentration at sample location 38-5 exceeded both the RC and the SSV in the 0-to 6-inch interval only, and not in both the 0-to 6-inch and the 18-to 24-inch intervals as previously stated.

- (3) Comment: Move the last two sentences of Section 8.1.2 on page 8-5 that refer to ecological impacts to Section 8.6, page 8-31.

Response: *The requested change was made. Each sentence became an additional "bulleted" item on page 8-31.*

- (4) Comment: In Table 8-6 on page 8-28, the "number of RC/SSV exceedances" for dieldrin is listed as "0/1" and is incorrect.

Response: *The table entry has been corrected to "1/0".*

- (5) Comment: Reword the first sentence on page 8-31.

Response: *The requested change was made.*